

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

March 2, 2021

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs write to inform the Court of the status of the Letters of Request sent to Sweden to conduct the deposition of witness Mohdar Abdullah.

The initial deposition hearing was held yesterday, March 1, at 9:00am CET at the Swedish district court in Södertälje, Sweden. Plaintiffs' counsel appeared remotely at the hearing ready to question the witness. U.S. counsel for the defendants the Kingdom of Saudi Arabia and Dallah Avco also appeared remotely. All of the parties were also represented by Swedish counsel present at the hearing.

Mohdar Abdullah did not appear at the hearing. The Swedish Court informed the parties that the witness called the Court twenty minutes before the hearing to report that he was ill with COVID - flu symptoms and could not attend. The Court ordered the witness to produce a doctor's certificate, which was submitted today, and also had the Court's Clerk call the doctor, who according to the Clerk's docket entry told the Clerk that the basis for his certificate was a conversation with the witness over the phone.

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The Swedish Court informed the parties today that the second hearing date scheduled for tomorrow, March 3, would be adjourned.

Plaintiffs asked the Swedish Court today to immediately set a new continued hearing date for the witness to appear to testify at his deposition.

Plaintiffs will advise this Court as soon as the new date is set by the Swedish Court for the deposition of Mohdar Abdullah.

Respectfully submitted,

KREINDLER & KREINDLER

MOTLEY RICE

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Committee for Personal Injury and Death
Claims

For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims

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